

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 05-10113-DPW
)	
REYLANDO REYES,)	
a/k/a REYLANDO RISE,)	
a/k/a RAYNALDO RISE,)	
a/k/a RAYLANDO RISE,)	
a/k/a RAY RISE,)	
)	
Defendant.)	

**ASSENTED-TO MOTION TO EXCLUDE THE TIME FROM
SEPTEMBER 13, 2005 THROUGH OCTOBER 20, 2005,
AND FOR AN ORDER ON EXCLUDABLE DELAY**

The United States hereby moves move, pursuant to 18 U.S.C. §3161(h)(8)(A) and Section 5(c)(1)(A) of the Plan for the Prompt Disposition of Criminal Cases of the United States District Court for the District of Massachusetts, to exclude the time within which trial must commence under 18 U.S.C. §3161(c)(1), excluding from such computation all time, commencing on September 13, 2005 (date of status conference), and concluding on October 20, 2005 (date of initial status conference).

As grounds therefor, the undersigned states that due to a family medical emergency additional time is needed for counsel for the defendant to finish reviewing the discovery materials, and the Court has granted said request.

WHEREFORE, the parties respectfully request, under 18 U.S.C. §3161(h)(8)(A) and §5(c)(1)(A) of Plan for Prompt Disposition of Criminal Cases of this Court, that this Court find, based on the

above, that the ends of justice are served by granting the requested exclusion, and that said exclusion outweighs the best interest of the public and the defendants in a speedy trial, and, accordingly, exclude all time, **commencing on September 13, 2005, and concluding on October 20, 2005**, in computing the time within which trial must commence under 18 U.S.C. §3161, and request that the Court enter an Order of Excludable Delay.

Counsel for the defendant, Elliot M. Weinstein , Esq., has given his assent to this motion.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY
Assistant U.S. Attorney
(617) 748-3103

Date: September 13, 2005

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
September 13, 2005

I, Antoinette E.M. Leoney, Assistant U.S. Attorney, do hereby certify that I have this day served by electronic court filing a copy of the foregoing to Elliot M. Weinstein, Esq., 228 Lewis Wharf, Boston, MA 02110.

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY